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March 11, 2024

Via ECF

Honorable Judge Laura Taylor Swain
U.S. District Court Judge
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Jesus Alberto Bautista Suero
23 CR 279

Dear Judge Swain:

I represent Mr. Bautista Suero on the above captioned matter. I write with the consent of the Government and Pre-trial services to respectfully request a modification of Mr. Bautista Suero's pre-trial release conditions.

Since February 20, 2024, Mr. Bautista Suero has been on home confinement enforced by GPS monitoring. I am respectfully seeking the modification of Mr. Batista Suero's pre-trial release to a curfew (hours to be set by Pre-Trial) with GPS Monitoring to accommodate Mr. Bautista Suero's employment.

Mr. Bautista Suero has received a job offer from A & R Demolition and Garbage as a demolition and garbage removal driver. The work hours are 7 A.M. to 5 P.M. Monday through Friday, with a nonstationary location due to the different job sites he would be driving to. Due to the changing locations of Mr. Bautista Suero's employment, the Defense is seeking the modification from home confinement to curfew.

I have conferred with Pre-Trial Officer Ashley Cosme and she consents to this request. AUSA Ni Qian defers to PO Cosme.

Thank you for your time and consideration of this request.

Respectfully Submitted,

s/ Elena Fast
Elena Fast, Esq.

The foregoing request is granted. DE 141 resolved.
SO ORDERED.
3/13/2024
/s/ Laura Taylor Swain, Chief USDJ